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LUCILE PACKARD CHILDREN'S HOSPITAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

STANFORD HOSPITAL & CLINICS and
LUCILE PACKARD CHILDREN'S
HOSPITAL,

Petitioners,

vs.

SERVICE EMPLOYEES
INTERNATIONAL UNION, LOCAL 715,

Respondent.

Case No: 5:07-CV-05158-JF

[PROPOSED] ORDER GRANTING
STANFORD HOSPITAL AND
CLINICS AND LUCILE PACKARD
CHILDREN'S HOSPITALS' MOTION
TO COMPEL RESPONSES TO
DISCOVERY SUBPOENA
PROPOUNDED TO LOCAL 521

Date: August 27, 2008
Time: 9:30 A.M.
Dept: Courtroom 4, 5th Floor

Judge: Hon. Jeremy Fogel
Magis. Judge: Hon. Richard Seeborg

SERVICE EMPLOYEES
INTERNATIONAL UNION, LOCAL 715

Petitioner and Counter-
Respondent,

vs.

STANFORD HOSPITAL & CLINICS and
LUCILE PACKARD CHILDREN'S
HOSPITAL

Respondents and Counter-
Petitioners.

Case No: 5:08-CV-00213-JF

Judge: Hon. Jeremy Fogel

[PROPOSED] ORDER GRANTING STANFORD HOSPITAL AND CLINICS AND LUCILE PACKARD
CHILDREN'S HOSPITALS' MOTION TO COMPEL RESPONSES TO DISCOVERY SUBPOENA
PROPOUNDED TO LOCAL 521

CASE NOS. 5:07-CV-05158-JF, 5:08-CV-00213-JF, 5:08-CV-00215-JF;
5:08-CV-00216-JF; 5:08-CV-01726-JF; 5:08-CV-01727-JF

SERVICE EMPLOYEES
INTERNATIONAL UNION, LOCAL 715

Petitioner,

vs.

STANFORD HOSPITAL & CLINICS and
LUCILE PACKARD CHILDREN'S
HOSPITAL

Respondents.

Case No: 5:08-CV-00215-JF

Judge: Hon. Jeremy Fogel

SERVICE EMPLOYEES
INTERNATIONAL UNION, LOCAL 715

Petitioner,

vs.

STANFORD HOSPITAL & CLINICS and
LUCILE PACKARD CHILDREN'S
HOSPITAL

Respondents.

Case No: 5:08-CV-00216-JF

Judge: Hon. Jeremy Fogel

SERVICE EMPLOYEES
INTERNATIONAL UNION, LOCAL 715

Petitioner,

vs.

STANFORD HOSPITAL & CLINICS and
LUCILE PACKARD CHILDREN'S
HOSPITAL

Respondents.

Case No: 5:08-CV-01726-JF

Judge: Hon. Jeremy Fogel

SERVICE EMPLOYEES
INTERNATIONAL UNION, LOCAL 715

Petitioner,

vs.

STANFORD HOSPITAL & CLINICS and
LUCILE PACKARD CHILDREN'S
HOSPITAL

Respondents.

Case No: 5:08-CV-01727-JF

Judge: Hon. Jeremy Fogel

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[PROPOSED] ORDER GRANTING STANFORD HOSPITAL AND CLINICS AND LUCILE PACKARD
CHILDREN'S HOSPITALS' MOTION TO COMPEL RESPONSES TO DISCOVERY SUBPOENA
PROPOUNDED TO LOCAL 521

CASE NOS. 5:07-CV-05158-JF, 5:08-CV-00213-JF, 5:08-CV-00215-JF;
5:08-CV-00216-JF; 5:08-CV-01726-JF; 5:08-CV-01727-JF

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2 The Motion to Compel Responses To Discovery Subpoena Propounded To Local
3 521 (the "Motion") brought by Stanford Hospital And Clinics and Lucile Packard
4 Children's Hospital (the "Hospitals"), in the above-referenced related cases came on for
5 hearing before the above-captioned Court, the Honorable Richard Seeborg presiding, on
6 _____, 2008.

7 The Court, having considered the pleadings in this matter, and all papers submitted
8 in support of, and in opposition to, said motion, and having heard the argument of
9 counsel, and good cause appearing therefore, hereby **GRANTS** the Motion in its entirety.

10 Service Employees International Union, Local 521 ("Local 521") shall provide
11 full and complete responses to the subpoenas propounded upon it by the Hospitals in the
12 above-referenced cases. Local 521's responses shall include electronically stored
13 information that is responsive to the subpoenas, including website-related information.
14 Any withholding of responsive information on the basis of a privilege or work product
15 protection shall be supported by a privilege log that identifies the documents withheld on
16 a document by document basis, including the following information:

- 17 1) the Bates number of the document;
- 18 2) the date of the document;
- 19 3) the specific individual author/s of the document;
- 20 4) the specific individual recipient/s of the document;
- 21 5) a precise document description;
- 22 6) the specific privilege/s claimed; and
- 23 7) the present location of the document.

24 Local 521 shall not withhold responsive information not subject to a privilege or work
25 product protection.

26 Local 521 is ordered to serve responsive documents on or before the tenth
27 business day following the date of this order.

1 It is further ordered that Local 715 shall pay the Hospitals' reasonable expenses
2 incurred in making this motion, including attorneys fees, in the amount of
3 \$_____.

4 IT IS SO ORDERED.

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6 Dated:

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HON. RICHARD SEEBORG
MAGISTRATE JUDGE OF THE
UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF
CALIFORNIA, SAN JOSE DIVISION